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NSTC GREAT LAKES
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LETTER REGARDING ILLINOIS ENVIRONMENTAL PROTECTION AGENCY COMMENTS
ON DRAFT FINAL SAMPLING AND ANALYSIS PLAN ADDENDUM PHASE 3 REMEDIAL
INVESTIGATION FOR SITE 12 HARBOR DREDGE SPOIL AREA NSTC GREAT LAKES IL

7/3/2013

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

PAT QUINN, GOVERNOR

LISA BONNETT, DIRECTOR

(217) 557-8155
(FAX) 782-3258

July 3, 2013

NAVFAC Midwest IPT EV
Attn: Ms. Terese Van Donsel
Building 1A
201 Decatur Avenue
Great Lakes, Illinois 60088-2801

Re: Sampling and Analysis Plan Addendum
Phase 3 Remedial Investigation for Site 12
Harbor Dredge Spoil Area
Naval Station Great Lakes

0971255048 -- Lake County
Naval Station Great Lakes
Superfund/Technical File

Dear Ms. Van Donsel:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the Navy's *Draft Final Sampling Analysis Plan Addendum, Phase 3 Remedial Investigation for Site 12 – Harbor Dredge Spoil Area, Naval Station Great Lakes, Great Lakes, Illinois (SAP)*. It was dated June 2013 and received at the Agency on June 20, 2013. The SAP constitutes the work plan for installation of groundwater monitoring wells and groundwater sampling to address the soil-to-groundwater migration issue at Site 12.

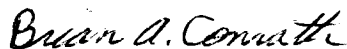
Illinois EPA has conducted a review of the submittal and has generated the following comments for the Navy to consider.

- 1) **Worksheet No. 2** – The Scoping Session is listed as occurring on March 20, 2013. That call was conducted on Thursday, March 21, 2013. This will need to be corrected throughout the SAP.
- 2) **Worksheets No. 9 and 11, and elsewhere** – Under Project Action Limits, the results should be compared to 35 Illinois Administrative Code (IAC) 620.420, the Illinois groundwater standards, rather than what is listed here. These regulatory values are enforceable and have the added weight of being ARAR.
- 3) **Worksheet No. 15** – The Matrix: Groundwater table contains several errors.
 - The PAL reference should be corrected to the Illinois groundwater standards.


- The Class II standard for Nickel should be corrected to 2000 µg/L.
 - The Class II standard for Thallium should be corrected to 20 µg/L.
 - The Class II standard for Silver should be corrected to ND. Use of the Class I standard is acceptable; however, this should be explained in a footnote.
 - The PAL concentrations for Calcium, Magnesium, Potassium, and Sodium should be combined and defined as the Class II standard for Total Dissolved Solids (1200 mg/L).
- 4) **Worksheet No. 15** – The Matrix: IDW entry for Heptachlor and Heptachlor Epoxide should be combined. The maximum regulatory level for Heptachlor includes any concentrations of Heptachlor Epoxide.
- 5) **Worksheet No. 15** – The Notes: for “1” should be corrected to reflect use of the 35 IAC 620.420 regulations. Many of the PAL columns include the footnote number “5”. This should be added to the Notes section or removed from the column headers.

If you have any questions regarding anything in this letter or require any additional information, please contact me at (217) 557-8155 or via electronic mail at brian.conrath@illinois.gov.

Sincerely,



Brian A. Conrath
Remedial Project Manager
Federal Facilities Unit
Federal Site Remediation Section
Bureau of Land

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cc: Corey Rich, Tetra Tech NUS, Inc.

Owen Thompson, USEPA (SR-6J)